

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

H.R.H. PRINCE FAISAL BIN KHALID BIN  
ABDULAZIZ AL SAUD,

Plaintiff,

-against-

PIA INVESTMENTS LIMITED, PAKISTAN  
INTERNATIONAL AIRLINES CORPORATION,

Defendants.

07 Civ. 5603 (NRB)(HBP)

**DECLARATION OF  
DONALD I STRAUBER IN  
SUPPORT OF MOTION TO  
COMPEL ARBITRATION OR  
DISMISS THE COMPLAINT**

DONALD I STRAUBER, hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the Bar of this Court and a partner at the law firm of Chadbourne & Parke LLP, counsel to defendants PIA Investments Limited ("Investments") and Pakistan International Airlines Corporation (the "Airline"). I submit this declaration in support of Defendants' motion to compel arbitration, or, in the alternative, to dismiss the Complaint on the ground of *forum non conveniens*, in order to put before the Court certain documents referred to in Defendants' accompanying Memorandum of Law.

2. Attached hereto as Exhibit A is a true and correct copy of the Shareholders' Agreement, dated June 30, 1979 by and between H.R.H. Prince Faisal Bin Khalid Bin Abdulaziz Al Saud, Investments and the Airline.

3. Attached hereto as Exhibit B is a true and correct copy of the Articles of Association of Investments.


4. Attached hereto as Exhibit C is a true and correct copy of the Complaint, dated June 4, 2007, in this action.

5. Attached hereto as Exhibit D is a true and correct copy of Section 176 of the BVI Business Companies Act.

6. Attached hereto as Exhibit E is a true and correct copy of Section 179 of the BVI Business Companies Act.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 27, 2007

  
Donald I Strauber